

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS**

EBONY LUSK,	§	
	§	Civil Action No. 3:12-cv-04840-B
Plaintiff,	§	
	§	
v.	§	
	§	
LINCOLN PARK ASSET RECOVERY,	§	
LLC d/b/a LPAR, LLC,	§	
	§	
Defendant.	§	
	§	

RESPONSE TO ORDER TO SHOW CAUSE

Plaintiff, Ebony Lusk (“Plaintiff”), hereby responds to the Court’s Order to Show Cause dated July 23, 2013.

1. On July 23, 2013, the Court Ordered Plaintiff show cause in writing why she has not moved for an entry of default against Defendant, or, alternatively, Plaintiff was to file a motion for entry of default with the clerk's office per Rule 55(a) and, if successful, file a motion for default judgment per Rule 55(b). See Docket Entry 8.

2. On July 23, 2013, Plaintiff requested the clerk enter default, which was entered the same day. See Docket Entries 9 and 10.

3. Following the entry of default, on July 30, 2013, August 1, 2013, and August 14 2013, the parties discussed the possibility of resolving this matter, and are very close to reaching a settlement in this matter.

4. For this reason, Plaintiff respectfully requests that the Court not dismiss her case, but grant her an additional thirty (30) days in which to move for default judgment if the settlement discussed between the parties does not reach fruition.

Plaintiff's case, but grant her an additional thirty (30) days to file a motion for default judgment should the parties settlement not reach fruition.

RESPECTFULLY SUBMITTED,

DATED: 08/14/13

KIMMEL & SILVERMAN, P.C.

By: s/ Amy L. Bennecoff

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CERTIFICATE OF SERVICE

I certify that on August 14, 2013, I electronically filed the foregoing document with the clerk of the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. Copy of the foregoing was sent to below via U.S. mail this 14th day of August 2013.

Lincoln Park Asset Recovery, LLC d/b/a LPAR, LLC
1223 Wilshire Drive #346
Santa Monica, California, 90403

Lincoln Park Asset Recovery, LLC d/b/a LPAR, LLC
c/o Corporate Creations Network, Inc.
131-A Stony Circle #500
Santa Rosa, California, 95401

/s/ Amy L. Bennecoff
Amy L. Bennecoff